

LOCATED AT (COURT ADDRESS)
14735 Main Street
Upper Marlboro, MD 20772

RECEIVED BY

PREMIER PARK

CASE NO.

DEC 19 2016

CV

PARTIES

Plaintiff

MARC VINSON COLE
643 PALMERTON TERRACE
LANDOVER, MD 20785

VS.

Defendant(s).

1.

Ocwen Loan Servicing, LLC.

PO Box 24736

West Palm Beach, FL 33416-4736

Serve by:

☐ Certified

Mail

☐ Private

Process

☐ Constable

Sheriff

2. Serve on Resident Agent:

CSC-Lawyers Incorporating Service Company

7 ST. Paul Street Suite 280

Baltimore, MD 21202

Serve by:

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☐ Constable

Sheriff

3.

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Mail

☐ Private

Process

☐ Constable

Sheriff

4.

Serve by:

☐ Certified

Mail

☐ Private

Process

☐ Constable

Sheriff

ATTORNEYS

For Plaintiff - Name, Address, Telephone Number & Code

MARC VINSON COLE
643 PALMERTON TERRACE
LANDOVER, MD 20785

COMPLAINT/APPLICATION AND AFFIDAVIT
IN SUPPORT OF JUDGMENT☒ \$5,000 or under ☐ over \$5,000 ☐ over \$10,000Clerk: Please docket this case in an action of ☒ contract ☐ tort
☐ replevin ☐ detinue ☐ bad faith insurance claim

The particulars of this case are:

28 May 2016 Plaintiff contacted Defendant to dispute a debt reported by the Defendant to the Credit Bureaus.

The Defendant failed to validate the debt and provide the credit bureaus with proper notice of the dispute within the required time frame. Specifically, the Defendant did not report the debt as disputed according to a credit report dated 29 June 2016 (a full 32 days after originally being notified of the dispute). Thus the Defendant violated state and federal law, including but not limited to, FCRA SECTION 623 (a) (3).

As a result of Defendant's failure to comply with the requirements of the FCRA, plaintiff has suffered, and continues to suffer, actual damages, including economic loss, denial of credit, lost opportunity to receive credit, damage to reputation, invasion of privacy, degraded social standing, and emotional distress for which plaintiff seeks damages.

(See Continuation Sheet)

The Plaintiff claims \$ 5,000.00, plus interest of \$ 0, Interest at the ☒ legal rate ☐ contractual rate calculated at _____ % from _____ to _____ (_____ days x \$ _____ per day) and attorney's fees of \$ _____ plus court costs.

☐ Return of the property and damages of \$ _____ for its detention in an action of replevin.
☐ Return of the property, or its value, plus damages of \$ _____ for its detention in action of detinue.
☐ Other: _____ and demands judgment for relief.

Signature of Plaintiff Attorney Attorney Code

Printed Name: MARC VINSON COLE

Address: 643 PALMERTON TER

Telephone Number: 703-986-8810

Fax:

E-mail: MARC.COLE@YMAIL.COM

MILITARY SERVICE AFFIDAVIT

☐ Defendant(s) _____ is/are in the military service.
☒ No Defendant is in the military service. The facts supporting this statement are: _____ Business _____

Specific facts must be given for the Court to conclude that each Defendant who is a natural person is not in the military.

☐ I am unable to determine whether or not any Defendant is in military service.

I hereby declare or affirm under the penalties of perjury that the facts and matters set forth in the foregoing Affidavit are true and correct to the best of my knowledge, information, and belief.

17 NOV 2016

Date

MARC VINSON COLE

Signature of Affiant

APPLICATION AND AFFIDAVIT IN SUPPORT OF JUDGMENT (See Plaintiff Notice on Back Page)

Attached hereto are the indicated documents which contain sufficient detail as to liability and damage to apprise the Defendant clearly of the claim against the Defendant, including the amount of any interest claimed.

☐ Properly authenticated copy of any note, security agreement upon which claim is based ☐ Itemized statement of account ☐ Interest worksheet
☐ Vouchers ☐ Check ☒ Other written document ☐ _____ ☐ Verified itemized repair bill or estimate

I HEREBY CERTIFY: That I am the ☒ Plaintiff ☐ _____ of the Plaintiff herein and am competent to testify to the matters stated in this complaint, which are made on my personal knowledge; that there is justly due and owing by the Defendant to the Plaintiff the sum set forth in the Complaint.

I solemnly affirm under the penalties of perjury and upon personal knowledge that the contents of the above Complaint are true and I am competent to testify to these matters.

17 NOV 2016

Date

MARC VINSON COLE

Signature of Affiant